



collect funds from those and other prior settlements. Moreover, the Receiver sought and obtained a trial setting in February 2020 against defendant Eddie Rollins.

#### **RECEIVER'S RECOVERIES TO DATE**

The Receiver originally sued more than 300 former Stanford employees in this lawsuit, but the Receiver's claims against Mr. Rollins are the only ones that remain to be tried. To date, the Receiver has obtained or will obtain in this lawsuit settlements and other recoveries from 258 former Stanford employees totaling approximately \$61.2 million.<sup>1</sup>

In April 2010, the Receiver sought a preliminary injunction concerning dozens of accounts held in the names of numerous former Stanford employees, which accounts were custodied at Pershing, SEI, or JPMorgan. The approximate value of those accounts as of the date of the Receiver's request for a preliminary injunction was \$25.0 million (after certain agreed account releases had occurred and after excluding accounts with negative balances), and the Court issued its preliminary injunction shortly thereafter. [See Doc. 393 at 23-28; Doc. 456.] Through his subsequent settlements and other litigation efforts, the Receiver has since recovered or anticipates recovery of approximately \$38.4 million from 119 former Stanford employees in this lawsuit who had such frozen accounts.<sup>2</sup> And although 21 former Stanford employees in this lawsuit previously declared bankruptcy, the Receiver was nevertheless able to recover approximately \$1.9 million from them in the aggregate.

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<sup>1</sup> The Receiver has sued other former Stanford employees in other lawsuits, asserting fraudulent-transfer and other claims. The Receiver will provide a separate update to the Court in the future regarding all of his litigation efforts against former Stanford employees.

<sup>2</sup> In addition, due to efforts outside of this lawsuit, the Receiver recovered approximately \$4.6 million from other former Stanford employees whose accounts were frozen by Court Orders in this case or the main SEC case.

### PROCEDURAL STATUS

With respect to the 313 former Stanford employees named in the Receiver's Third Amended Complaint [*see* Docs. 1532, 1533], the Receiver sets forth in detail the procedural status of each former Stanford employee as follows:

- 243 former Stanford employees have been dismissed from the lawsuit<sup>3</sup>;

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<sup>3</sup> The 243 dismissed former Stanford employees are: Jeffrey E. Adams, Paul Adkins, Peggy Allen, Orlando Amaya, Tiffany Angelle, Susana Anguiano, James F. Anthony, Sylvia Aquino, Juan Araujo, George Arnold, John Michael Arthur, Patricio Atkinson, Brown Baine, Isaac Bar, Elias Barbar, Stephen R. Barber, Jonathan Barrack, Jane E. Bates, Timothy W. Baughman, Marie Bautista, Oswaldo Bencomo, Teral Bennett, Lori Bensing, Andrea Berger, Norman Blake, Stephen G. Blumenreich, Michael Bober, Fernando Braojos, Alexandre Braune, Alan Brookshire, Nancy Brownlee, Richard Bucher, George Cairnes, Fausto Callava, Robert Bryan Cannon, Frank Carpin, Rafael Carriles, Scott Chaisson, James C. Chandley, Naveen Chaudhary, Susana Cisneros, Neal Clement, Michael Conrad, Bernard Cools-Lartigue, Don Cooper, James Cox, John Cravens, Shawn M. Cross, Patrick Cruickshank, Greg R Day, William S. Decker, Michael DeGolier, Andres Delgado, Ray Deragon, Arturo R. Diaz, Carter W. Driscoll, Sean Duffy, Christopher Shannon Elliotte, Thomas Espy, Jordan Estra, Nolan Farhy, Evan Farrell, Marina Feldman, Blanca Fernandez, Freddy Fiorillo, Lori J. Fischer, Rosalia Fontanals, James Fontenot, Juliana Franco, John Fry, Attlee Gaal, Miguel A. Garces, Gustavo A. Garcia, David Braxton Gay, Gregg Gelber, Mark Gensch, Gregory C. Gibson, Michael D. Gifford, Eric Gildhorn, Luis Giusti, Steven Glasgow, John Glennon, Susan Glynn, Stephen Brown and Richard Binswanger (in their capacities as the Executors of the Estate of Larry Goldsmith), Ramiro Gomez-Rincon, Joaquin Gonzalez, Juan Carlos Gonzalez, Russell Warden Good, John Grear, Stephanie A. Green (in her capacity as Independent Executrix of the Estate of Jason Green), Stephen Greenhaw, Mark Groesbeck, Billy Ray Gross, Donna Guerrero, John Gutfranski, Rodney Hadfield, Jon Hanna, Dirk Harris, Virgil Harris, Kelley L. Hawkins, Charles Hazlett, Roberto T. Helguera, Patricia Herr, Helena M. Herrero, John Holliday, Nancy J. Huggins, Wiley Hutchins, Jr., David Innes, Allen Johnson, Susan K. Jurica, Marty Karvelis, Joseph L. Klingen, Robert A. Kramer, David Wayne Krumrey, Bruce Lang, Jason LeBlanc, William Leighton, Mayra C. Leon De Carrero, Francois Lessard, James C. Li, Gary Lieberman, Trevor Ling, Christopher Long, Robert Long, Jr., Humberto Lopez, Luis Felipe Lozano, David Lundquist, Michael MacDonald, Anthony Makransky, Megan R. Malanga, Manuel Malvaez, Maria Manerba, Michael Mansur, Iris Marcovich, Janie Martinez, Claudia Martinez, Aymeric Martinoia, Bert Deems May Jr., Carol McCann, Francesca McCann, Pam McGowan, Gerardo Meave-Flores, Nolan N. Metzger, William J. Metzinger, Donald Miller, Trenton Miller, Brent B. Milner, Peter Montalbano, Rolando H. Mora, David Morgan, Shawn Morgan, Jonathan Mote, Carroll Mullis, Spencer Murchison, Jon Nee, Aaron Nelson, Russell C. Newton, Jr., Norbert Nieuw, Lupe Northam, Monica Novitsky, Kale Olson, John D. Orcutt, Walter Orejuela, Zack Parrish, Tim Parsons, William Peerman, Beatriz Pena, Roberto Pena, Roberto A. Pena, Dulce Perez mora, Tony Perez, James D. Perry, Marlene F. Perry (in her capacity as the Independent Executrix of the Estate of Lou Perry), Brandon R. Phillips, Randall Pickett, Eduardo Picon, Christopher Prindle, A. Steven Pritsios, Maria Putz, Sumeet Rai, Nelson Ramirez, David Rappaport, Charles Rawl, Syed H. Razvi, Kathleen M. Reed, Steven Restifo, Giampiero Riccio, Jeffrey Ricks, Juan C. Riera, Alan Riffle, Randolph E. Robertson, Steve Robinson, Timothy D. Rogers, Peter R. Ross, Rocky Roys, Thomas G. Rudkin, Julio Ruelas, Nicholas P. Salas, Tatiana Saldivia, John Santi, Christopher K. Schaefer, Louis Schaufele, William Scott, Leonard Seawell, Morris Serrero, Doug Shaw, Nick Sherrod, Jon C. Shipman, Jordan Sibler, Brent Simmons, Edward Simmons, Steve Slewitzke, Sanford Steinberg, Heath Stephens, William O. Stone, Jr., David M. Stubbs, Mark V. Stys, Timothy W. Summers, Paula S. Sutton, William Brent Sutton, Juan Carlos Terrazas, Scot Thigpen, Christopher Thomas, Mark Tidwell, Jose Torres, Al Trullenque, Audrey Truman, Roberto Ulloa, Eric Urena, Miguel Valdez, Nicolas Valera, Tim Vanderver, Jaime Vargas, Ettore Ventrice, Mario Vieira, Maria Villanueva, Chris Villemarette, Charles Vollmer, Donald Whitley, John Whitfield Wilks, Thomas Woolsey, Michael Word, and Ryan Wrobleske.

- 29 former Stanford employees have executed settlement agreements with the Receiver but have not yet been dismissed from the lawsuit<sup>4</sup>;
- 1 former Stanford employee, Daniel Hernandez, had a Final Judgment entered against him and has since executed a settlement agreement with the Receiver, through which that Final Judgment has been fully satisfied [see Doc. 4069];
- 36 other former Stanford employees have had Final Judgments entered against them, none of which have been fully satisfied to date<sup>5</sup>;
- 1 former Stanford employee, Edward Prieto, has declared bankruptcy, and the Receiver has elected not to pursue a request to lift the bankruptcy stay as to him;
- the Receiver's claims in this case against 2 former Stanford employees, Jay Comeaux and Bernerd E. Young, were stayed through the issuance of the mandate in the *Lloyd's* appeal, and now that the mandate has issued, the Receiver intends to discuss the potential further extension of that stay with counsel for Mr. Comeaux and Mr. Young; and
- trial against the sole remaining former Stanford employee, Eddie Rollins, is set for February 10, 2020 [see Doc. 4064].

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<sup>4</sup> The 29 former Stanford employees who have executed settlement agreements but who have not yet been dismissed are: James R. Alguire, Donald Bahrenburg, Nigel Bowman, Charles Brickey, Ron Clayton, Jason Fair, Roger Fuller, Gary Haindel, Luis Hermosa, Steven Hoffman, Charles Hughes, Charles Jantzi, Grady Layfield, James LeBaron, Mona Jean Reeves Lenoir (in Her Capacity as the Executrix of the Estate of Robert Lenoir), Douglas McDaniel, Matthew McDaniel, Lawrence Messina, Hank Mills, Scott Notowich, Saraminta Perez, Judith Quinones, Michael Ralby, John Schwab, Haygood Seawell, Paul Stanley, Bill Whitaker, David Whittemore, and Charles Widener.

<sup>5</sup> The 36 other former Stanford employees with Final Judgments entered against them are: Victoria Anctil, Monica Ardesi, Mauricio Aviles, Timothy Bambauer, Fabio Bramanti, Jane Chernovetzky, Jose Cordero, Oscar Correa, Ken Crimmins, James Cross, Pedro Delgado, Ana Dongilio, Torben Garde Due, Neil Emery, Ignacio Felice, Martine Hernandez, Alfredo Herraiez, Robert Hogue, Marcos Iturriza, Faran Kassam, Humberto Lepage, Jason Likens, Alberto Montero, Alfonso Ortega, Ernesto Pena, Arturo Prum, Walter Ricardo, Rochelle Sidney, Peter Siragna, Nancy Soto, Ana Tanur, Yliana Torrealba, Evelyn Villalon, Daniel Vitrian, Ihab Yassine, and Leon Zaidner.

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Respectfully submitted,

**BAKER BOTTS L.L.P.**

By: /s/ Kevin M. Sadler

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**CERTIFICATE OF SERVICE**

On November 29, 2019, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve the parties individually or through their counsel of record, electronically, or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Kevin M. Sadler

Kevin M. Sadler